

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

NEIL LEVITT, Individually and on behalf of all  
others similarly situated,  
Plaintiff,  
v.  
NORTHWELL HEALTH, INC. and PERRY  
JOHNSON & ASSOCIATES, INC.,  
Defendants.

Case No. 2:23-cv-1892-ART-NJK  
**ORDER GRANTING  
STIPULATION TO EXTEND TIME TO  
RESPOND TO COMPLAINT**  
**(FIRST REQUEST)**

Plaintiff Neil Levitt, individually and on behalf of all others similarly situated, (“Plaintiff”) and Defendant Northwell Health, Inc. (“Northwell”) stipulate and respectfully request under Local

1 Rule IA 6 that this Court extend the time for Northwell to respond to Plaintiff's complaint in the  
2 above-captioned action (the "Complaint") until **January 29, 2024**.

3 Plaintiff filed the Complaint on November 16, 2023 and served on Northwell on November  
4 27, 2023. Northwell's response is currently due by December 18, 2023.

5 Northwell requires this extension to evaluate the complex allegations and causes of action  
6 raised in the Complaint, evaluate the merits of each claim, understand the complexities of  
7 discovery, speak with plaintiff and co-defendant counsel in each case, and consider options for  
8 consolidation or transfer in order to preserve judicial economy. Northwell also requests this  
9 additional time to evaluate the numerous putative class action complaints that have been filed  
10 against Northwell in Federal and State courts—including ten actions in this District alone—  
11 concerning the facts and circumstances that gave rise to the Complaint. A list of these related cases  
12 is included as Appendix A.<sup>1</sup>

13 This is the first request for extension of time for this deadline. The parties respectfully  
14 submit that there is good cause for this extension and the requested extension is not for the  
15 purpose of delay.

16  
17  
18  
19  
20 ///

21 ///

---

22  
23 <sup>1</sup> Northwell also notes that several additional putative class action complaints have been filed against co-defendant  
24 Perry Johnson & Associates, Inc. ("PJ&A") in Federal and State courts. *See Carter v. Cook County Health and Perry*  
25 *Johnson & Associates, Inc.*, No. 2:23-cv-1866 (D. Nev. filed Nov. 13, 2023); *Kurtev et al. v. Cook County Health &*  
26 *Hospitals System and Perry Johnson & Associates, Inc.*, No. 2:23-cv-1905 (D. Nev. filed Nov. 17, 2023); *Belov et al.*  
27 *v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-1925 (D. Nev. filed Nov. 20, 2023); *Colon et al. v. Perry Johnson &*  
28 *Associates, Inc.*, No. 2:23-cv-1910 (D. Nev. filed Nov. 20, 2023); *Davis v. Perry Johnson & Associates, Inc.*, No. 2:23-  
cv-1932 (D. Nev. filed Nov. 21, 2023); *O'Neill et al. v. Perry Johnson & Associates, Inc. and County of Cook, Illinois*,  
No. 2:23-cv-1964 (D. Nev. filed Nov. 28, 2023); *Sept et al. v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01983  
(D. Nev. filed Nov. 30, 2023); *Kimber v. Cook County Health & Hospital System and Perry Johnson & Associates,*  
*Inc.*, No. 2023CH09293 (Ill. Cir. Ct., Cook County filed Nov. 7, 2023); and *Martin v. Cook County Health & Hospital*  
*System and Perry Johnson & Associates, Inc.*, No. 2023CH09558 (Ill. Cir. Ct., Cook County filed Nov. 21, 2023).  
Northwell has not been named as a defendant in any of these complaints.

1 IT IS SO STIPULATED.

2 Dated: December 6, 2023.

Dated: December 6, 2023.

3 SNELL & WILMER

STRANCH, JENNINGS  
& GARVEY, LLC

5 By: /s/ Aleem A. Dhalla  
6 Alex L. Fugazzi (NV Bar #9022)  
7 Aleem A. Dhalla (NV Bar #14188)  
8 3883 Howard Hughes Parkway, Ste 1100  
9 Las Vegas, NV 89169-5958  
10 Telephone: (702) 784-5200  
11 afugazzi@swlaw.com  
12 Adhalla@swlaw.com

13 William L. Roberts\*  
14 Kathryn E. Caldwell\*  
15 Andrew B. Cashmore\*  
16 ROPES & GRAY LLP  
17 Prudential Tower  
18 800 Boylston Street  
19 Boston, Massachusetts 02199-3600  
20 Phone: (617) 951-7000  
21 Fax: (617) 951-7050  
22 william.roberts@ropesgray.com  
23 kathryn.caldwell@ropesgray.com  
24 andrew.cashmore@ropesgray.com

25 Glen J. Dalakian II\*  
26 ROPES & GRAY LLP  
27 1211 Avenue of the Americas  
28 New York, New York 10036-8704  
Phone: (212) 596-9000  
Fax: (212) 596-9090  
glen.dalakian@ropesgray.com

*Counsel for Defendant Northwell  
Health, Inc.*  
*\*pro hac vice forthcoming*

By: /s/ Nathan R. Ring  
Nathan R. Ring, Esq.  
2100 W. Charleston Boulevard, Suite 208  
Las Vegas, NV 89102  
nring@stranchlaw.com

Jeff Ostrow (*Pro Hac Vice*)  
Ken Grunfeld (*Pro Hac Vice*)  
KOPELOWITZ OSTROW P.A.  
One West Las Olas Blvd., Suite 500  
Fort Lauderdale, Florida 33301  
Telephone: 954-525-4100  
ostrow@kolawyers.com  
grunfeld@kolawyers.com

*Counsel for Plaintiff and Putative Class*

**ORDER**

Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is GRANTED. Northwell Health, Inc. shall have up to and including **January 29, 2024** to respond to Plaintiff's complaint.

**IT IS SO ORDERED.**

DATED: December 7, 2023.

  
Nancy J. Koppe

- 3 - United States Magistrate Judge